

Matthew Cunanan, WSBA #42530
matthew@dclglawyers.com

Hon. Jamal N. Whitehead

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VALVE CORPORATION,

Plaintiff,

Case No. 2:23-cv-01016-JNW

v.

DECLARATION OF MATTHEW
CUNANAN

LEIGH ROTHSCHILD, ROTHSCHILD
BROADCAST DISTRIBUTION SYSTEMS, LLC,
DISPLAY TECHNOLOGIES, LLC, PATENT
ASSET MANAGEMENT, LLC, MEYLER
LEGAL, PLLC, AND SAMUEL MEYLER,

Defendants.

I, Matthew Cunanan, declare the following:

1. My name is Matthew Cunanan. I am local counsel for defendants in the above referenced case. I am competent to testify as to the matters set forth in this declaration and I make this declaration based upon my own personal knowledge.

2. On September 18, 2023, I was engaged by defendants for the limited purpose of serving as local counsel in this matter.

3. I have not acted as lead counsel or participated in any of the decision-making process for this litigation, as all decisions have been made exclusively by Don McPhail and his law firm.

4. Since engagement, I have only been paid a flat rate of \$500.00 in this matter.

DECLARATION OF MATTHEW CUNANAN- 1

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1 5. In the interest of preserving client confidences and respecting the attorney-client
2 privilege, I have not attached to this Declaration communications and documents relating to
3 relationship between Defendants, lead counsel and myself.

4 6. If the Court believes review of these materials would be helpful, I can provide
5 them for in camera review.

6 7. As such, I still intend to file for withdrawal in the event that lead counsel Don
7 McPhail & Merchant Gould's Motion for Leave to Withdraw as Counsel for Defendants is
8 granted.

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10
11 DATED: June 2, 2025 at Burien, WA.

12 s/ Matthew Cunanan

13 Matthew Cunanan, WSBA #42530

14 Attorney for Defendants *Leigh Rothschild,*

15 *Rothschild Broadcast Distribution Systems, LLC,*

16 *Display Technologies, LLC, Patent Asset*

17 *Management, LLC, Meyler Legal, PLLC &*

18 *Samuel Meyler*

19 matthew@dclglawyers.com